

EXHIBIT

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION

UNITED STATES OF AMERICA, ex rel.)
DILBAGH SINGH, M.D., PAUL KIRSCH,)
M.D., V. RAO NADELLA, M.D., and)
MARTIN JACOBS, M.D.,)
)
Relators,)
) Civil Action
vs.) No. 04-186E
)
BRADFORD REGIONAL MEDICAL CENTER,)
V&S MEDICAL ASSOCIATES, LLC,)
PETER VACCARO, M.D., KAMRAN SALEH,)
M.D., and DOES I through XX,)
)
Defendants.)

DEPOSITION OF JAMES H. JORDON

WEDNESDAY, JULY 2, 2008

1 failed, along with the auditors, the lawyers, all the
2 other parties that were involved with this particular
3 institution.

4 Q. Who was the plaintiff?

5 A. The plaintiff were the investors.

6 Q. Where was this filed?

7 A. It was filed in Texas.

8 Q. In the --

9 A. Houston.

10 Q. -- Federal Court?

11 A. I don't believe so.

12 Q. State court. And that has been the only time
13 you have been deposed?

14 A. Yes.

15 MR. SIMPSON: To start with, I would like
16 to mark as Exhibit 1 a copy of your expert
17 report, which you don't need a copy of.

18 (Jordon Deposition Exhibit No. 1 was
19 marked for identification.)

20 A. To close the loop on that question, though, the
21 case did go to trial, and the case was dismissed
22 before it went to a jury, and it is on appeal. That
23 is where it stands.

1 Q. But you as an individual, did you say you were
2 dismissed before trial?

3 A. Yes.

4 Q. I'm going to show you Exhibit 1 and ask you to
5 look at that, and tell me, is that a copy of the
6 expert report that you rendered in this case?

7 A. Based on page one, yes, but if I could flip it
8 just to --

9 Q. Feel free. I will tell you that is actually
10 the actual copy I got in the mail, not even a
11 photocopy of it or anything.

12 A. This is a copy of my expert report.

13 Q. You can keep that. We will be probably
14 referring to it a good bit.

15 MR. SIMPSON: I would like to go ahead and
16 mark as Exhibit 2 a document that was just
17 given to us this morning if I could.

18 (Jordon Deposition Exhibit No. 2 was
19 marked for identification.)

20 Q. I am showing you Exhibit 2, which is a document
21 entitled Bradford Time Summary. Can you tell me what
22 this is?

23 A. My understanding was disclosure is required as

1 C E R T I F I C A T E

2 COMMONWEALTH OF PENNSYLVANIA :
 3 COUNTY OF ALLEGHENY : : SS.:

4 I, Joy A. Hartman, a Notary Public in and for
 5 the Commonwealth of Pennsylvania, do hereby certify
 6 that before me personally appeared JAMES H. JORDON,
 7 the witness herein, who then was by me first duly
 8 cautioned and sworn to testify the truth, the whole
 9 truth and nothing but the truth in the taking of his
 oral deposition in the cause aforesaid; that the
 testimony then given by him as above set forth was
 reduced to stenotypy by me, in the presence of said
 witness, and afterwards transcribed by computer-aided
 transcription under my direction.

10 I do further certify that this deposition was
 11 taken at the time and place specified in the foregoing
 caption, and signature was not waived.

12 I do further certify that I am not a relative
 13 of or counsel or attorney for any party hereto, nor am
 I otherwise interested in the event of this action.

14 IN WITNESS WHEREOF, I have hereunto set my hand
 15 and affixed my seal of office at Pittsburgh,
 Pennsylvania, on this 9th day of July, 2008.

16 The foregoing certification does not apply to
 17 any reproduction of this transcript in any respect
 unless under the direct control and/or direction of
 18 the certifying reporter.

19

20	Commonwealth of Pennsylvania
	NOTARIAL SEAL
21	JOY A. HARTMAN, Notary Public
	City of Pittsburgh, County of Allegheny
22	My Commission Expires May 9, 2010

Joy A. Hartman
 Joy A. Hartman, Notary Public
 in and for the Commonwealth of
 Pennsylvania

23 My commission expires May 9, 2010.